UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: June 9, 1982

SUBJECT: PCB Compliance Inspection at Acme Scrap Iron and Metal at 2101 State Road in Ashtabula, Ohio

FROM: Daniel C. Watson, Physical Scientist
THRU: A.R. Winklhofer, Director, EDO

TO: Karl E. Bremer, 5HT
ATTN: Sheldon Simon, 5HT

Attached is copy of the PCB inspection report for Acme Scrap Iron and Metal, Ashtabula, Ohio conducted on March 30, 1982. This inspection was conducted at the request of your office and the Ohio EPA. During the inspection the inspectors discovered the following:

1. Hundreds of insulators from capacitors and transformers plus two banks of large drained PCB capacitors located in an area where transformers are reportedly burned and dismantled.

2. A large discharge of PCB laden oil draining from this property to Fields Brook via the city storm sewers. The facility has no NPDES permit.

3. A pool of oil on the property similar to the PCB laden oil found at Fields Brook.

On May 5, 1982, the writer and Charles Beier of EDO, took photographs of a large mound of transformer casings at this facility. These photographs were taken from Middle Road and copies will be sent to your office at a later date.

David Barna, U.S. EPA - EDO, visited the facility on June 2 to look at the facility's newly constructed oil separator. Mr. Barna found that the separator was improperly constructed and not working efficiently.

Attachments

cc: Ed DiDomenico, 5WQC

June 9 1982

Report on the Inspection to Determine Compliance with the PCB Disposal and Marking Regulations

Acme Scrap Iron and Metal
2101 State Road
Ashtabula, Ohio

Performed by:

U.S. Environmental Protection Agency
Environmental Services Division
Eastern District Office
25089 Center Ridge Road
Westlake, Ohio 44145

PCB Compliance Inspection Report

I. Company Identification

Acme Scrap Iron and Metal
2101 State Road
Ashtabula, Ohio

Responsible Official

Sam Simon, President

II. Date of Inspection

March 30, 1982

III. Participants

Company

Sam Simon, President
Steve Tackett

U.S. EPA - Region V

Daniel C. Watson, Physical Scientist (author)
Carles J. Beier, Engineering Technician
David R. Barna, Environmental Engineer

Ohio EPA

Steve Tuckerman

IV. Objectives

The inspection was conducted to document the company's handling, storage and disposal practices and to determine its compliance with the PCB Disposal and Marking Regulations, 40 CFR, Part 761, as published in the Federal Register of May 31, 9879.

V. Company Background

Acme Scrap Iron and Metal is a scrap yard that reportedly receives PCB transformers for disposal. For several years local residents have called the Ohio EPA's Northeast District Office, complaining about the company burning transformers in order to recover copper, aluminum, and steel to sell as scrap metal. The Ohio EPA has made several visits to the site, but has not been able to witness the act of burning transformers. The property is soaked in oil and runoff is discharged to Fields Brook via city storm sewers. The facility's discharge has been sampled by the Ohio EPA and U.S. EPA (EDO PCB inspection report dated March 1, 1982) and high levels of PCBs have been found in the discharged oil on all occassions. An absorbent boom was placed in the brook by the OEPA to contain the discharged oil. The State has asked the company to maintain this boom. They have not maintained it properly and oil is flowing into Fields Brook from this area. This facility has no NPDES permit.

At the request of the State, the company is constructing an oil separator which was in a construction phase during the inspection. David Barna, U.S. EPA-EDO inspected this system on June 2, 1982 and his statement is attached (Attachment 1 and Figure 2).

A. Opening Conference

The inspection party arrived at the facility at 0900 and talked to Sam Simon, President Acme Scrap. The inspectors presented their credentials. Mr. Simon was angry, and said "he does not handle PCBs, we should leave him alone, and should go to New York and bother Hooker Chemical". The writer asked Mr. Simon about the large quantity of PCBs being discharged from his facility and informed him that our inspection was being conducted to try to determine their source. He stated that he will "fold his business and that will solve the problem." Since Mr. Simon stated that he "has never taken PCB items" and did not want our paperwork, the Notice of Inspection and TSCA Confidentiality Form were not issued.

Steve Tackett, Foreman, Acme Scrap, gave us a tour of the facility. During the tour we picked out sampling points and traced sewer lines.

B. Electrical Equipment

At the location where transformers reportedly have been burned for scrap, hundreds of transformer and capacitor insulators were found. There were also two PCB capacitor banks, each consisting of three large capacitors, drained and lying half buried.

C. Recordkeeping, Marking/Labeling, Disposal, Storage

There are no records of PCBs at this facility. None of the scrapped electrical equipment is tested for PCBs or labeled. There is no PCB storage area and the only disposal is by burning and cutting the items and selling their components for scrap.

D. Oils

There is a large quantity of oil leaving this site via storm sewers and discharging to Fields Brook. The facility has no NPDES permit. This oil has been sampled by both U.S. EPA and Ohio EPA and had PCB concentrations from 190 to 400 ppm. The Ohio EPA placed a sorbent boom around the sewer discharge and Acme Scrap personnel periodically remove the oil it collects. There are no storage areas for this oil at the facility and company officials would give no information about disposal. Oil is leaking from behind the boom and entering Fields Brook.

At the northeast section of the property, near the juncture of the roadway and the railroad track, was a large puddle of oil identical to the type of oil being discharged to Fields Brook.

E. Drainage and Water System

This facility discharges PCB laden oil to Fields Brook via the city storm sewers, part of which the inspection crew was able to trace. The company is building an "oil separator" at the main trunk line located in their front property. Because of a great discrepancy between the quality of the water flowing through the trunk line and that entering Fields Brook, it can be assumed that there is another sewer line, originating near the burn area and not connecting into the trunk line.

F. Closing Conference

There was no closing conference. In the opening conference both Sam Simon and Steve Tackett told us to go collect our samples and expressed no desire to participate in the rest of the survey.

VI. Samples

The following samples were collected (Figure 1):

S01 was an oil plus water sample taken from a trench in the northeast section of the property at the juncture of a roadway and railroad track. The surface of which was covered with a heavy layer of oil.

S02 was taken from an area west of Building I (see attachment) where a large quantity of insulators, similar to those used on transformers and capacitors, were strewn about. In fact several capacitors were photopraphed in this same area.

S03 was voided.

S04 was taken from an opening in the main discharge line from the property located at the proposed treatment lagoon. There was an oil film on the water.

S05 was taken from a central catch basin located on the west side of Building I and midway relative to the length of Building I. Water with an oil sheen was flowing through this basin.

S06 was taken from a manhole at the juncture of State and Middle Roads. The sample source was verified by introducing Rhodamine B dye into the sewer at the S04 sample point and detecting same at the manhole. This was done after samples were drawn. The dye was introduced at 12:06 p.m. and reached the manhole at 12:21 p.m.

S07 was taken from the mouth of the discharge line and inside the oil boom at Fields Brook. The oil behind the boom was of the same color and consistency as that collected at S01. Following the sampling the same dye introduced at S04 appeared at 12:37 p.m., thus establishing that the Acme discharge travels directly to Fields Brook.

S08 was a sample drawn from a ground runoff line that also discharges into Fields Brook inside the oil boom area of confinement.

S09 was a sample drawn from Fields Brook immediately outside of the oil boom and clearly discernable as a plume from under the boom.

The following PCB concentrations were detected:

Sample Number	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCB	Sample Type
S01	19 ppm	< 5 ppm	7 ppm	< 5 ppm	26 ppm	Oil and Water
S02	< 5 ppm	< 5 ppm	20 ppm	12 ppm	32 ppm	Soil
S04	< 5 ppb	< 5 ppb	0.7 ppb	< 0.5 ppb	0.7 ppb	Water
S05	< 0.5 ppb	< 0.5 ppb	0.8 ppb	< 0.5 ppb	0.8 ppb	Water
S07	< 0.5 ppm	< 0.5 ppm	240 ppm	< 0.5 ppm	240 ppm	Oil Layer and Water
S07	< 0.5 ppb	< 0.5 ppb	6.5 ppm	< 0.5 ppb	6.5 ppm	Enulsufied Oil and Water Layer
S08	< 0.5 ppb	< 0.5 ppb	0.8 ppb	< 0.5 ppb	0.8 ppb	Water
S09	< 0.5 ppb	4.6 ppb	< 0.5 ppb	0.4 ppb	5.0 ppb	Water

Sample S06 was broken in shipment from CRL to a contract laboratory. Sample S01 and S07 were compared by IR and FID/TSD at the laboratory. IR indicated no detectable differences between samples and GC showed significant similarities between the samples.

VII. Findings and Conclusions

There is a steady discharge of PCB laden oil off Acme Scrap's property into Fields Brook via city storm sewers. The facility has no NPDES permit. Samples S01 (oil collected from the property) and S07 (oil at Fields Brook) were compared in the laboratory and found to be similar. PCBs were also detected in all the sampled facility storm sewers. Dye was placed in the facility's storm sewers at 12:06 p.m., reached the manhole at State and Middle Roads at 12:21 p.m., and reached Fields Brook at 12:37 p.m. Because of the difference in quality between the water flowing through the facility's sewer trunk line and that entering Fields Brook, an undiscovered back lot storm sewer is suspected to exist.

There was evidence (in the form of insulators and a drained capacitor bank) that the company is taking transformers and capacitors. Oil, water, and soil samples collected on the property showed significant PCB contamination. The company is collecting PCB laden oil from behind the State's boom in Fields Brook. Company personnel would give no information on the handling, storing or disposal of this oil. Water samples collected in Fields Brook, outside the boom, showed significant concentrations of PCBs entering the brook (5 ppb).

ATTACHMENT 1

The holding pond was inspected on June 2, 1982 by David Barna of the Eastern District Office and Dennis Lee of OEPA-NEDO. A storm sewer was cut to serve as inlet to the pond and the pond's effluent is routed back into this sewer at the pond outlet.

However, the pipe was not sealed totally on the other end of the inlet break. Short circuiting of flow was observed during the time of inspection. This was mentioned to the company by Dennis Lee and they said they would take care of the situation by placing some concrete in the pipe.

A slight oil sheen was observed on the influent to the pond.